

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

QAADIRA CHANEL ROBERSON,

Debtor

CHAPTER 13

CASE NO. 5:22-bk-02242-MJC

**AFFIDAVIT OF CARLO SABATINI**

1. I have carefully considered the Court's decision in *In re Badyrka*. Virtually all of the reductions that the Court applied in that case were because of the Court's findings that certain tasks should have been delegated to professionals that charge a lower rate – i.e., certain tasks that were performed by an attorney should have been performed by a paralegal or a secretary, or other tasks that were performed by a paralegal should have been performed by a secretary. There were only a few instances in *Badyrka* where the Court found that the task should not have been billed at all.

2. Attached to the fee application is a .pdf printout of a spreadsheet. In that spreadsheet, I attempt to apply the Court's findings in *Badyrka* to ensure that the amounts that are requested herein are consistent with the Court's previous decision.

3. Columns A – G of the spreadsheet contain the entries on the bill that is attached to the fee application as Exhibit B.

4. For many of those entries, Columns H – I of the spreadsheet contain the date and text of comparable entries from the bill in *Badyrka*. Column J indicates the appropriate level of billing that the Court found in *Badyrka*: (A)ttorney, (P)aralegal, (S)ecretarial or (N)o billable.

5. For example, the entry in the eighth row on the instant bill is “Receive and review email from client with paystubs for budget analysis.” Columns K shows a similar entry from *Badyrka*: “Receive and review emails (4) from client attaching paystubs.” Column L shows that in

*Badyrka* the Court held that this type of time was billable by a paralegal. Thus, in column H a discount of \$26.50 was applied to effectively reduce the billed rate from that of an attorney to that of a paralegal.

6. After the exercise of reasonable billing judgment, I have applied an additional discount of over \$2,800.00.

7. The debtor in this case supports the requested fee. She has received full disclosure of the alternative billing arrangements that are used by some other bankruptcy attorneys and of the impact that payment of the fee will have on her plan. An affidavit from the debtor is attached to the fee application.

8. If the Court still has concerns that prevent it from approving the requested application in full, then the Applicant respectfully requests an opportunity to be apprised of those concerns and to attempt to respond to them before the Court issues a decision.

Executed on March 24, 2023

  
\_\_\_\_\_  
Carlo Sabatini

# Signature Certificate

Reference number: 9EAPM-QDKIS-TOURG-L8GU4

## Signer

## Timestamp

## Signature

### Carlo Sabatini

Email: carlo@bankruptcypa.com

Sent: 24 Mar 2023 19:42:58 UTC  
Viewed: 24 Mar 2023 19:43:30 UTC  
Signed: 24 Mar 2023 19:44:00 UTC

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